

ORIGINAL

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FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

JUL 24 2006
at 10 o'clock and 08 min. M
SUE BEITIA, CLERK

Attorney for Defendant No. 02
HOLLY KOLIOPOULOS

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 05-00106-02 ACK
)	
Plaintiff,)	REPLY MEMORANDUM IN
)	SUPPORT OF MOTION IN
vs.)	LIMINE TO EXCLUDE
)	EVIDENCE OF DEFENDANT'S
HOLLY KOLIOPOULOS,)	PARENTING SKILLS AND
)	RESPONSIBILITIES FILED
Defendant.)	JULY 5, 2006; CERTIFICATE
)	OF SERVICE
)	
)	Date: July 27, 2006
)	Time: 10:00 a.m.
)	Judge: Alan C. Kay

REPLY MEMORANDUM
IN SUPPORT OF MOTION IN LIMINE TO EXCLUDE EVIDENCE OF
DEFENDANT'S PARENTING SKILLS AND RESPONSIBILITIES
FILED JULY 5, 2006

COMES NOW Defendant No. 02 HOLLY KOLIOPOULOS

(hereinafter "Koliopoulos"), by and through her counsel, Harlan Y. Kimura, and

hereby submits this Reply Memorandum In Support Of Motion In Limine To Exclude Evidence Of Defendant's Parenting Skills And Responsibilities filed herein on July 5, 2006 (hereinafter "Parenting Motion").

I. REPLY ARGUMENT.

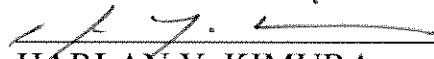
The Government appears to concede that the Parenting Evidence is irrelevant to its case in chief. United States' Response And Opposition To Defendant Koliopoulos' Motions In Limine filed herein on July 19, 2006 (hereinafter "Memo In Opp") at 3. Therefore, the Parenting Motion should be granted. However, if Koliopoulos introduces the Parenting Evidence by way of cross-examination, or in her case in chief, the Government in all fairness should also be entitled to introduce all or any portion of the Parenting Evidence. In that event and at the suggestion of the Government, this Honorable Court should first issue a ruling whether the Government is entitled to introduce all or any portion of the Parenting Evidence.

III. CONCLUSION.

Based upon the Parenting Motion, Memo In Opp, and all the foregoing, Koliopoulos respectfully requests her Motion In Limine To Exclude Evidence Of Defendant's Parenting Skills And Responsibilities be GRANTED and the Government prohibited from introducing all or any portion of the

Parenting Evidence unless it receives this Honorable Court's permission to do so prior thereto.

DATED at Honolulu, Hawaii, JUL 24 2006.



HARLAN Y. KIMURA
Attorney for Defendant No. 02
HOLLY KOLIOPOULOS

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was duly served upon the following parties listed below, in the manner described thereto, at their last-known addresses, on JUL 24 2006.


By U.S. Mail By Hand Delivery

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X

Attorneys for Plaintiff
UNITED STATES OF AMERICA

DATED at Honolulu, Hawaii, JUL 24 2006.



HARLAN Y. KIMURA
Attorney for Defendant No. 02
HOLLY KOLIOPOULOS